

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ERICH MANDEL,)	
)	
Plaintiff,)	
)	
)	
v.)	Case Number: 18-cv-08385
)	
SEIU LOCAL 73, and COMMUNITY)	Hon. John Robert Blakey
CONSOLIDATED SCHOOL DISTRICT 15,)	
)	
Defendants.)	
)	
)	

JOINT SUPPLEMENTAL STATUS REPORT

In advance of the further status conference set for March 19, 2019 at 10:15 a.m., all parties jointly submit the following update to the parties' Initial Joint Status Report submitted on January 28, 2019 (Dkt. 19).

MIDP Compliance

The parties exchanged initial MIDP disclosures on February 28, 2019.

Damages and Other Relief

Plaintiff's initial disclosures state that, in light of SEIU's refund to Plaintiff of all dues withheld after August 21, 2018, and the termination of dues deductions from Plaintiff's pay, Plaintiff's "prayer for relief now only includes the following: declaratory relief that the union dues taken before and after June 27, 2018 were unconstitutional because Mr. Mandel did not provide affirmative consent; declaratory relief that the union dues authorization did not constitute affirmative consent; damages in the amount of union dues withheld after June 27, 2018 that were not otherwise returned; damages in the amount of union dues withheld before June 27, 2018 limited to the date of the statute of limitations; attorneys' fees and costs."

The Parties' initial disclosures further reflect that, while SEIU Local 73 continues to dispute Plaintiff's right to recover any union dues withheld from his pay, the parties agree that the amount of union dues withheld from Plaintiff's pay within the applicable two-year limitations period that have not previously been refunded is \$924.00.

Status of Settlement Discussions

SEIU Local 73 has engaged in initial settlement discussions with Plaintiff, but the parties did not reach an agreement. SEIU Local 73 believes an early settlement conference with a Magistrate Judge is likely to be productive. Plaintiff does not believe an early settlement conference is likely to be productive.

Dated: March 13, 2019

Respectfully Submitted,

By: Eileen B. Goldsmith
Eileen B. Goldsmith (*pro hac vice*)

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